

Appendix A



**FOOD SAFETY
SERVICE PLAN**

ADUR AND WORTHING

1 April 2016 – 31 March 2017

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1 SERVICE AIMS AND OBJECTIVES

- 1.1 *Aims and Objectives* - The main aim of the food safety service is to ensure that food produced, purchased and/or consumed in Adur and Worthing is safe and without risks to health. This aspiration will be met by the appropriate and proportionate enforcement of food safety legislation, carrying out inspections of food and food premises, sampling and analysis of foodstuffs, the investigation of complaints regarding food and food premises, including cases of food poisoning, and the provision of advice to businesses and the public on legislative requirements and good food hygiene practice.
- 1.2 It meets the Councils' objectives in the Council priority to "deliver interventions that improve the health of our communities" and links with the Public Health Delivery Plan.

2 BACKGROUND

2.1 *Profile of the Local Authority* – The Adur District has a population of approximately 59,000 and occupies a coastal strip of 4181 hectares of mainly light industrial and residential development between the South Downs and the sea. The area includes a small, mainly leisure, airport and a seaport, part of which lies in the City of Brighton & Hove. Worthing is a compact urban seaside borough. It is the largest town in West Sussex with a population of around 100,000, covering an area of 3300 hectares.

2.2 *Organisational Structure* – The food safety function is carried out by officers in the Public Health & Regulation team, which falls under the Head of Wellbeing within the Communities Directorate. A chart showing how the service fits into the Council structure is shown in Figure 1.

Specialist Services – analytical services are provided by Hampshire Scientific Services – Portsmouth. Microbiological examinations are undertaken by the Public Health England's Food, Water and Environmental Microbiology Laboratory at Porton Down, near Salisbury.

2.3 *Scope of Food Service* – The service covers food hygiene inspections of premises, inspections of food, foodstuff and food premises complaint investigations, food poisoning investigations (sporadic cases and outbreaks), occasional provision of food hygiene training for food handlers, food safety promotional activities, provision of advice and guidance on legal requirements and good practice to new and existing businesses.

Officers providing the food service also undertake health & safety hazard spotting and provision of advice, or enforcement where necessary, when in food premises.

2.4 *Demands on the Food Service* – the following is a break down of registered food premises in the Adur District and Worthing Borough at 1st April 2016:

TYPE OF PREMISES	NUMBER
Producer/Manufacturer/processor	20
Packer/Distributor	32
Retailer	324
Caterer	1213
TOTAL	1589

For Worthing the age profile of the local population is reflected in the large number of registered residential and nursing care establishments, which cater for a particularly vulnerable sector of the population. There is also a large number of seasonal businesses associated with the town's popularity as a seaside resort and as these businesses can only be accessed for inspection during the summer period the demands on the inspection programme can be skewed.

In December 2010 the Adur and Worthing Environmental Health service, including the food safety function, co-located and is now based at Portland House, Richmond Road, Worthing. The service can be accessed from 9am to 5pm Monday – Friday, excluding Bank Holidays. Cases of genuine emergency, such as food poisoning outbreaks reported outside normal hours are referred via the Council's emergency contact arrangements to the Team Leader (Specialist Food and Health & Safety).

- 2.5 The Councils have a documented Public Health & Regulation Enforcement Policy which details the enforcement approach for the whole service, including food safety, based on good practice guidance from Local Government Regulation and the Regulators' Code from the Better Regulation Delivery Office.

3 SERVICE DELIVERY

- 3.1 *Food Premises Inspections* – The routine inspection programmes are in accordance with the arrangements set out in the Food Law Code of Practice. The programmes are logged on Northgate Environmental Health software and standard reports enable progress, and future demand, to be constantly monitored. The programmed food hygiene inspections due in the period 1 April 2016 to 31 March 2017 are shown in the table below:

Risk Category	Inspections/Interventions Due
A = High Risk – inspected every 6 months	2 (4 if the category is not changed)
B = High Risk – inspected every 12 months	62

C = Medium Risk – inspected every 18 months	213
D = Low Risk – inspected every 24 months	256
Total	533
E = Low Risk – intervention contact every 36 months – alternative enforcement strategy	81
Number of new businesses (estimate based on previous year’s numbers and registrations received for first 6 months of current financial year)	200

The premises in risk category E are permitted by the Food Law Code of Practice to be subject to an alternative enforcement approach due to the low risk nature of these businesses (for example those that sell only shelf-stable foods that do not require refrigeration or have a very small customer base). For 2016-17 it is proposed to contact those businesses due for intervention with a detailed questionnaire to confirm that the nature and risks of the business remain low. If any responses indicate an increase in risk, then a visit will be carried out. Any premises not returning a questionnaire will receive a visit.

Based on the percentage of non-compliant premises from the last year, it is estimated that at least 40 follow-up visits will be necessary where premises are required to undertake remedial measures to deal with significant non-compliance or lack of food safety management. Inspections will include checks on imported food product stocks where appropriate. Inspections will normally take place during the trading hours of the business, which will necessitate officers working outside normal office hours.

3.2 *Ship sanitation inspections*

Under the International Health Regulations 2005 local authorities that have ports within their district are obliged to inspect sea going vessels that land in their waters, if their Ship Sanitation Control Exemption Certificates have expired. These are renewable every 6 months. It is expected that around 20 inspections will be done in 2016/17, at Shoreham Harbour.

3.3 *Complaints regarding foodstuffs* – The team will continue to investigate all complaints received regarding the safety of food. The team will provide all the assistance it is able to and if it is not the enforcing authority will transfer details and/or complaint samples to the appropriate enforcement authority. The investigation will incorporate consideration of the risk to public health, compliance with statutory requirements, measures required to prevent recurrence and customer expectations. The documented food complaint procedure is in accordance with Local Government Regulation Guidance (Guidance for local authorities dealing with food complaints). Action taken on conclusion of the investigation will be in accordance with the Public Health &

Regulation Enforcement Policy. It is anticipated that in the order of 50 complaints are likely to require investigation across Adur and Worthing (based on last year's figures).

- 3.4 *Home Authority Principle* – This is a formal arrangement between large companies and one local authority. Complaints and enquiries are channelled through one local 'home' authority officer, for efficiency. The home authority principle is supported, but there are no formal agreements with any food businesses in the district.
- 3.5 *Primary Authorities* - The Primary Authority scheme came into force on 6 April 2009 and is co-ordinated by the Better Regulation Delivery Office. The basis of this scheme is that a business having a chain of outlets may choose to go into partnership with its local authority, called a 'primary authority'. Before regulators from other authorities take enforcement action, except emergency measures, they must consult the primary authority if the business has one. Adur and Worthing do not currently have a Primary Authority agreement and there are none pending.
- 3.6 *Advice to Businesses* – The team has a strong commitment to providing an advisory role on legislative requirements and good practice for both new and existing businesses. New and prospective businesses are identified from informal contacts, area surveillance, applications for planning consent and building regulation approval and food premises registration. All of these are proactively offered advice, verbally, in writing, and on site visits. Such approaches are considered an investment to reduce the likely need for enforcement activities at a later stage.

Significant new developments in legislation or recognised good practice will continue to be brought to the attention of existing businesses by a range of measures including mailshots, officer visits, and workshops/seminars as appropriate. Advisory visits to businesses will continue to be made, outside of the routine inspection programme.

- 3.7 *Food Inspection/Sampling* – The team will participate in the annual Public Health England food sampling programme which is co-ordinated locally by the Sussex Food Liaison Group.
- 3.8 *Control and Investigation of Outbreaks and Food Related Infectious Disease*
The team will continue to investigate all formal and informal notifications of illness associated with the consumption of food or water. Investigation will be in accordance with Public Health Laboratory Service guidelines ("Preventing person to person spread following gastro-intestinal infections: guidelines for public health physicians and environmental health officers 2004" supplemented by guidance for the control of infection with E.Coli VTEC ("The VTEC Operational Manual", issued 2010), Department of Health Guidelines (Management of outbreaks of foodborne illness), and the Surrey & Sussex Health Protection Unit Outbreak Plan for Communicable Disease (2010). In the order of 80 notifications of sporadic cases are likely to require investigation (based on past experience), and at least two outbreaks of food poisoning or viral illness requiring investigation, are to be expected. Officers

within the team will be first responders in line with the Emergency Plan, in the event of a serious outbreak.

- 3.9 *Food Safety Incidents* – The team will continue to respond to food safety incidents in accordance with the provisions of The Food Law Code of Practice, and all food alerts issued by the FSA will continue to be dealt with in accordance with this Code. It is difficult to predict the service demand likely to be created by food hazard alerts but it is anticipated that in the order of 10 Food Alerts For Action (FAFA) will be received.
- 3.10 *Liaison Arrangements with Other Organisations* – The Team Leader (Specialist Food and Health & Safety) is a member of the Sussex Food Liaison Group which meets quarterly. This Group is attended by the Food Safety managers of all other East and West Sussex authorities and the prime aim is to promote consistency of approach, co-ordination and good enforcement practice across the County. The Group includes representatives from Trading Standards, the Public Analyst, and Public Health England. An Environmental Health Practitioner attends the Food Working Group of the Chartered Institute of Environmental Health (CIEH) Sussex Branch. As well as dealing with consistency and technical issues this Group also organises training events for food enforcement officers across East and West Sussex. The team also has access to a strong informal network of local contacts in neighbouring authorities. The team is represented by an Environmental Health Technician on the Countywide Sussex Health Protection Group which includes Consultants in Communicable Disease Control and Consultant Microbiologists. The remit of this Group includes all aspect of infection control, including food related illness, particularly the monitoring and review of the operation of the major outbreak plan.

Arrangements are in place to ensure that all building control applications and planning applications relating to food businesses are scrutinised by the team.

- 3.11 *Food Safety Promotion Work* – The team will promote food safety topics via social media, particularly during Food Safety Week in July and Christmas week. One member of the team is a 'social media champion'.
- 3.12 *Food Hygiene Rating Scheme*. The National Scheme to publicise the food hygiene ratings (scored from 0 to 5) obtained by businesses undergoing routine inspections has been in place in Sussex since April 2011. The ratings are available on the Food Standards Agency's website. Window stickers and certificates showing the rating are also provided for public display on the premises. The rating is to be reviewed at each routine inspection.



Example window sticker

- 3.13 *Illegal cockle and mussel picking on the River Adur.* For several years reports have been received of large groups of people collecting shellfish from the River Adur in the Norfolk Bridge area. This area is not classified for shellfish harvesting and consumption of these shellfish is likely to lead to serious illness. The area is also a Site of Special Scientific Interest. The team will investigate these claims this year in conjunction with the Police, Southern Inshore Fisheries & Conservation Authority, Gangmasters Licensing Authority and other interested groups.
- 3.14 *Project plans to be taken forward for the next 2 years.* Four key areas are to be focussed on to reduce the 'yo-yo' phenomenon of businesses improving their food hygiene ratings and then letting standards lapse. These are designed to produce long term effects and to also have a beneficial effect on the local economy, the service and the health of the local population.
- a) The 'Carrots and Sticks' approach. We will encourage and publicise those businesses that consistently receive high food hygiene ratings after their inspections. We will offer them the chance to apply for an Eat Out Eat Well Award and reward them with publicity. In contrast, those that have poor standards will be subject to enforcement. We will work in partnership with other departments to achieve this.



Eat Out Eat Well Healthy Eating Award logo

- b) We will engage with businesses and the public to achieve collaborative working, including the use of social media. For example videoing a 'fridge within one of the caterers that has consistently gained a '5' and uploading it to YouTube to coach lower performing caterers on good practice.
- c) We will profile the local area to enable us to target our resources more effectively, such as areas of deprivation and those with a lack of outlets providing healthy food options.
- d) Income generation for the service, in conjunction with providing a service required by businesses, such as food hygiene training courses. These would aim to create a small profit which could be re-invested to provide subsidised courses for charities.

4 RESOURCES

- 4.1 *Staffing Allocation.* There are 3.8 (as opposed to 5.8 last year) full time equivalent officers allocated to food safety work, plus a Team Leader, working across Adur and Worthing. Two of the Environmental Health Practitioners (EHPs) also undertake health and safety enforcement duties and

environmental protection work, taking up 10% of their time. It is estimated that 6.0 full time equivalent staff are needed to provide a complete food safety service, including sampling, out of hours work such as markets and events and responding to incidents out of hours. The Regulatory Support Officer can only undertake information gathering and is not authorised to do inspections or complaint work. Two other EHPs need further training before they can achieve the competency required by the new Food Law Code of Practice.

The following table shows the allocation of staff:

Position	Full time equivalent for food work	Competency
Team Leader (PM)	0.9	Full
EHP (FW)	0.9	Full
EHP (WA)	0.9	Full
EHP (CM)	0.6	Full
EH Technician (AS)	1.0	Restricted
EH Technician (RG)	0.4	Full
Regulatory Support Officer (TC)	1.0	Restricted
Admin team leader (AB)	0.4	-
Admin assistant (SM)	0.7	-

In order to be able to complete the program we will use alternative means of carrying out interventions for lower risk premises and, as in previous years, to engage a suitably qualified external Environmental Health Officer on a per visit contract basis to ensure adequate performance on the programme. (Some provision for the use of external contractors is already encompassed within the budget). External staff will only be asked to inspect medium or low risk premises.

- 4.2 *Staff Development* – The identification of officer training needs is a fundamental part of the Council wide annual staff appraisal process. Training needs will be met by a combination of in-house briefings, online courses and external seminars and short courses. Records of training for each individual officer will continue to be maintained. The Food Law Code of Practice requires each officer to undertake a minimum of 20 hours continuous professional development annually.

5 QUALITY ASSESSMENT

- 5.1 Performance against inspection programme targets and response times to service requests is kept under review by the Team Leader. A documented monitoring procedure is in place.

6 REVIEW

Performance on the premises inspection programme and on service level standards for response times will be monitored by the Team Leader and reviewed quarterly. A review of performance against this 2016/17 Plan will be reported to the Executive members after March 2017.

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